

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

FILED
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COLUMBUS

2009 APR 28 P 5:03

UNITED STATES OF AMERICA

vs.

: NO. 2:09-cr-112
JUDGE FROST

OSCAR FERERO (1)

18 U.S.C. §2

aka Oscar Feredo

18 U.S.C. §1951

aka Paola Ramirez

FERNANDO PATINO CRUZ (2)

aka Julio Angel Casiano Ruiz

aka Giovanni Rodriguez

YHARIEL ALESSANDRO ROVERANDO-MONDRAGON (3)

KEVIN ISMAEL MIRANDA (4)

DONALD JOSE BONILLA-CANALES (5)

BERNARDO SANCHEZ-PEREZ (6)

I N D I C T M E N T

THE GRAND JURY CHARGES:

COUNT 1

Beginning on or about April 1, 2009, and continuing to on or about April 6, 2009, the exact dates being unknown to the grand jury, in the Southern District of Ohio and elsewhere, the defendants, OSCAR FERERO, aka Oscar Feredo, aka Paola Ramirez (hereinafter OSCAR FERERO), FERNANDO PATINO CRUZ, aka Julio Angel Casiano Ruiz, aka Giovanni Rodriguez (hereinafter FERNANDO PATINO CRUZ), YHARIEL ALESSANDRO ROVERANDO-MONDRAGON, KEVIN ISMAEL MIRANDA, DONALD JOSE BONILLA-CANALES, and BERNARDO SANCHEZ-PEREZ and others unknown to the grand jury, did knowingly, wilfully and unlawfully combine, conspire, confederate, and agree with each other to unlawfully obstruct and affect commerce and the movement of articles in such commerce by robbery, in violation of 18 U.S.C. §1951.

It was part of this conspiracy that the defendants, OSCAR FERERO, FERNANDO PATINO CRUZ, YHARIEL ALESSANDRO ROVERANDO-MONDRAGON, KEVIN ISMAEL MIRANDA, DONALD JOSE BONILLA-CANALES, and BERNARDO SANCHEZ-PEREZ, planned to rob a businessman engaged in commercial activities in and affecting commerce, that is, the said businessman intended to purchase and did purchase items made by manufacturers and producers outside of the State of Ohio, which items moved and were to move in interstate commerce from outside the State of Ohio for use and sale by the said businessman within the Southern District of Ohio and elsewhere.

It was further a part of this conspiracy that one or more co-conspirators utilized commercial airlines to travel from outside the State of Ohio into the Southern District of Ohio.

It was further a part of this conspiracy that one or more co-conspirators utilized one or more rental vehicles to drive into the Southern District of Ohio and/or to provide a means to get away after robbing a businessman.

It was further a part of this conspiracy that one or more co-conspirators attended the Equine Show at the Ohio State Fairgrounds, Columbus, Ohio, a show which included the display and sale of jewelry by several vendors.

It was further a part of this conspiracy that one or more of the co-conspirators possessed a window punch tool to break three windows of a vehicle driven a businessman.

It was further a part of this conspiracy that one co-conspirator attacked and held a businessman while two other co-conspirators took possession of two suitcases which contained jewelry.

It was further a part of this conspiracy that a co-conspirator rented two hotel rooms in Wayne, New Jersey in order to sort and store stolen jewelry.

OVERT ACTS

In furtherance of the conspiracy and in order to effect its objectives, in the Southern District of Ohio, and elsewhere the defendants, OSCAR FERERO, FERNANDO PATINO CRUZ, YHARIEL ALESSANDRO ROVERANDO-MONDRAGON, KEVIN ISMAEL MIRANDA, DONALD JOSE BONILLA-CANALES and BERNARDO SANCHEZ-PEREZ, committed one or more of the following overt acts:

1. On April 1, 2009, defendant OSCAR FERERO boarded a US Airways flight in Long Beach, California.
2. On April 1, 2009, defendant FERNANDO PATINO CRUZ boarded a Frontier Airlines flight in Denver, Colorado.
3. On April 1, 2009, defendant YHARIEL ALESSANDRO ROVERANDO-MONDRAGON boarded an American Airlines flight in Los Angeles, California.
4. On April 1, 2009, defendant BERNARDO SANCHEZ rented a vehicle at Alamo Rental agency at the Chicago O'Hare Airport.
5. On April 3, 2009, defendants KEVIN ISMAEL MIRANDA and DONALD JOSE BONILLA-CANALES rented two hotel rooms at the Baymont Inn and Suites, 4240 International Gateway, Columbus, Ohio.

6. On April 3, 2009, an unknown co-conspirator broke the window of a businessman's vehicle.
7. On April 3, 2009, an unknown co-conspirator held a businessman while two other co-conspirator's took possession of two suitcases.
8. On April 3, 2009 an unknown co-conspirator drove a rental vehicle containing an unknown number of co-conspirators after a businessman had been robbed of several items of jewelry.
9. On April 4, 2009, defendant YHARIEL ALESSANDRO ROVERANDO-MONDRAGON rented two hotel rooms at the Ramada Inn, 334 Route 46 Service road, Wayne, New Jersey.

All in violation of 18 U.S.C. § 1951.

COUNT 2

1. At all times material to this Indictment, Victim A, ~~owned~~ a jewelry business, doing business under the name "Ornaments," with a home base in Jeffersonville, Indiana. At all times pertinent to this Indictment, Victim A engaged in commercial activities in and affecting commerce, that is, the said Victim A intended to purchase and did purchase items made by manufacturers and producers outside of the States of Indiana and Ohio, which items moved and were to move in interstate commerce from outside the States of Indiana and Ohio for use and sale by the said Victim A within the Southern District of Ohio and elsewhere.


2. On or about April 3, 2009, in the Southern District of Ohio, the defendants, OSCAR FERERO, FERNANDO PATINO CRUZ, YHARIEL ALESSANDRO ROVERANDO-MONDRAGON, KEVIN ISMAEL MIRANDA, DONALD JOSE BONILLA-CANALES and BERNARDO SANCHEZ-PEREZ did unlawfully obstruct and affect commerce and the movement of articles in such commerce by robbery, in that OSCAR FERERO, FERNANDO PATINO CRUZ, YHARIEL ALESSANDRO ROVERANDO-MONDRAGON, KEVIN ISMAEL MIRANDA, DONALD JOSE BONILLA-CANALES and BERNARDO SANCHEZ-PEREZ ^{R.D.} ~~and~~ did unlawfully take and obtain jewelry of a value of more than \$1,000,000.00, from one or more persons having lawful custody of such jewelry, by means of actual and threatened physical violence in furtherance of such robbery.

In violation of 18 U.S.C. §1951 and §2.


A TRUE BILL.

s/foreperson
FOREPERSON

GREGORY G. LOCKHART
UNITED STATES ATTORNEY



GARY L. SPARTIS
Deputy Criminal Chief
Assistant United States Attorney

I Certify that this is a true and correct copy of the original filed in my office on <u>4/28/09</u> , JAMES BONINI, CLERK By:  Date: <u>4/29/09</u>
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